

O/F



December 8, 2017

The Honorable Nicholas G. Garaufis  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: *Batalla Vidal et al. v. Duke et al.*, No. 16cv4756 (NGG) (JO)

Dear Judge Garaufis:

This letter is submitted on behalf of Plaintiffs in the above-captioned action. Pursuant to the Court's October 2, 2017 briefing schedule, Plaintiffs will file and serve their motion for preliminary injunction on December 15, 2017. Plaintiffs respectfully request leave to file a memorandum of law that exceeds the 25-page limit that would otherwise apply by 15 pages, for a total of 40 pages. Plaintiffs do not expect their memorandum of law to exceed 40 pages. Defendants' counsel do not oppose this request.

Respectfully submitted,

/s/ Mayra B. Joachin

David Chen, Law Student Intern  
Susanna D. Evarts, Law Student Intern  
Victoria Roeck, Law Student Intern  
Healy Ko, Law Student Intern  
Hannah Schoen, Law Student Intern  
Emily Villano, Law Student Intern  
Muneer I. Ahmad, Esq.<sup>†</sup>  
Marisol Orihuela, Esq.<sup>†</sup>  
Michael J. Wishnie, Esq. (MW 1952)  
JEROME N. FRANK LEGAL SVCS. ORG.  
michael.wishnie@yale.edu  
Phone: (203) 432-4800

Amy S. Taylor, Esq. (AT 2056)  
Deborah Axt, Esq. (DA 4885)

Jessica R. Hanson, Esq.<sup>†</sup>  
Mayra B. Joachin, Esq.<sup>†</sup>  
Trudy S. Rebert, Esq.\*  
Karen Tumlin, Esq.<sup>†</sup>  
NATIONAL IMMIGRATION LAW CENTER  
3450 Wilshire Blvd, #108-62  
Los Angeles, CA 90010  
Phone: (213) 639-3900

Justin Cox, Esq.<sup>†</sup>  
NATIONAL IMMIGRATION LAW CENTER  
PO Box 170208  
Atlanta, GA 30317  
Phone: (678) 279-5441

Scott Foletta, Esq.\*  
Alexia Schapira, Esq.\*  
MAKE THE ROAD NEW YORK  
301 Grove Street  
Brooklyn, NY 11237  
Phone: (718) 418-7690

Joshua A. Rosenthal, Esq.†  
NATIONAL IMMIGRATION LAW CENTER  
1121 14th Street NW  
Suite 200  
Washington, DC 20005  
Phone: (202) 216-0261

*Attorneys for Plaintiffs*

† *Appearing pro hac vice*

\* *Pro hac vice* motion forthcoming

cc: Counsel for Defendants (*via ECF*)

Counsel for State Plaintiffs in No. 1:17-cv-05228-NGG-JO (*via email*)

Application granted.  
Jo or sup;  
s/Nicholas G. Garaufis  
/ 12/14/17 v